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6 Attorneys for Defendant  
SALVADOR ORTIZ-PADILLA  
7

8 IN THE UNITED STATES DISTRICT COURT  
9 FOR THE EASTERN DISTRICT OF CALIFORNIA  
10

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 vs.

14 SALVADOR ORTIZ-PADILLA,

15 Defendant.  
16

Case No. 1:21-cr-00239-JLT-SKO

STIPULATION TO CONTINUE CHANGE OF  
PLEA HEARING; ORDER

17 IT IS HEREBY STIPULATED, by and between the parties through their respective  
18 counsel, Assistant United States Attorney Justin Gilio, counsel for plaintiff, and Assistant  
19 Federal Defender Reed Grantham, counsel for Salvador Ortiz-Padilla, that the change of plea  
20 hearing currently scheduled for January 29, 2024, may be continued to February 20, 2024, at  
21 9:00 a.m.

22 The parties have been in active plea negotiations regarding a resolution in this case. As a  
23 result of these discussions, Mr. Ortiz-Padilla has found it necessary to consult with an  
24 immigration attorney to more fully understand the impact of any plea in this case. Accordingly,  
25 Mr. Ortiz-Padilla requires additional time and opportunity to discuss these issues with an  
26 immigration attorney. Therefore, the parties are requesting to continue the January 29, 2024  
27 change of plea hearing to February 20, 2024. This will provide time for Mr. Ortiz-Padilla to  
28 consult with his immigration attorney and for the parties to finalize the plea documents prior to

1 the change of plea hearing.

2 The requested continuance is made with the intention of conserving time and resources  
3 for both the parties and the Court. The government is in agreement with this request and the  
4 requested date is a mutually agreeable date for both parties. The parties stipulate that for the  
5 purpose of computing time under the Speedy Trial Act, the Court should exclude time from the  
6 date of this order through February 20, 2024, for defense preparation and investigation, pursuant  
7 to 18 U.S.C. § 3161(h)(7)(A) and (B)(iv). The parties agree that the ends of justice served by  
8 resetting the change of plea hearing outweigh the best interest of the public and the defendant in  
9 a speedy trial.

10  
11 Respectfully submitted,

12 HEATHER E. WILLIAMS  
13 Federal Defender

14 Date: January 23, 2024

/s/ Reed Grantham  
15 REED GRANTHAM  
Assistant Federal Defender  
16 Attorney for Defendant  
SALVADOR ORTIZ-PADILLA

17  
18 PHILLIP A. TALBERT  
19 United States Attorney

20 Date: January 23, 2024

/s/ Justin Gilio  
21 JUSTIN GILIO  
Assistant United States Attorney  
22 Attorney for Plaintiff  
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**ORDER**

**IT IS SO ORDERED.** The change of plea hearing currently set for January 29, 2024, is hereby continued to February 20, 2024, at 9:00 a.m.

The time through February 20, 2024, is excluded under the Speedy Trial Act pursuant to 18 U.S.C. § 3161(h)(7)(A) and (B)(i) and (iv), as the ends of justice served by granting the continuance outweigh the best interest of the public and the defendant in a speedy trial.

IT IS SO ORDERED.

Dated: **January 23, 2024**

  
UNITED STATES DISTRICT JUDGE